

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and FACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

District Judge Douglas P.
Woodlock

Magistrate Judge Robert B.
Collings

MARK ZUCKERBERG and
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY TO FACEBOOK
DEFENDANTS' OPPOSITION TO CONNECTU'S MOTION TO COMPEL FACEBOOK
DEFENDANTS' PRODUCTION OF DOCUMENTS IN RESPONSE TO
REQUEST FOR PRODUCTION NOS. 171, 174-182, AND 184-187**

Plaintiff ConnectU LLC hereby moves for leave to file a reply to Facebook Defendants' Opposition to ConnectU's Motion to Compel Facebook Defendants' Production of Documents in Response to Request for Production Nos. 171, 174-182, and 184-187 (attached hereto as Exhibit A).

As grounds for this motion, a reply brief is necessary to address new issues raised in Facebook Defendants' Opposition and to clarify the record for the Court. New issues raised in the Opposition are Facebook Defendants' new arguments regarding the relevance and breadth of Plaintiff's production requests, new objections raised for the first time in the Opposition, and various erroneous statements in Facebook Defendants' Opposition that require correction.

Plaintiff's reply (Exhibit A) will clarify these issues and will assist the Court in ruling on Plaintiff's Motion to Compel Facebook Defendants' Production of Documents in Response to Request for Production Nos. 171, 174-182, and 184-187. The Proposed Order granting this assented-to motion is attached as Exhibit B.

CERTIFICATION UNDER L.R. 7.1

Plaintiff's counsel hereby certifies under L.R. 7.1 that Troy Grabow, counsel for Plaintiff, conferred with counsel for the Facebook Defendants (Robert Nagel), and that they consent to this motion.

DATED: February 7, 2006

/s/ Troy E. Grabow
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Attorneys for Plaintiff and Counterclaim
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 7, 2006.